

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT  
OF TENNESSEE AT COLUMBIA

BRANDON FRAZIER,

Plaintiff,

v.

ENOCH GEORGE, Sheriff of Maury  
County, LT. DEBRA WAGONSHUTZ,  
FLOYD SEALEY, MAURY REGIONAL  
MEDICAL CENTER, ABL  
MANAGEMENT, INC., and  
GENELLA POTTER,

Defendants.

No. 1:12-cv-0128

JUDGE HAYNES  
JURY DEMAND

*BRUSH*

*This motion  
is GRANTED, but  
the Order is*

*REAFFIRMED.*

*The duty to  
preserve relevant evidence  
arises from the date that the  
party has notice of the  
claim until the litigation concludes  
Corporate policy does not define  
litigation. Valid obligations  
under  
federal  
law.*

DEFENDANTS ABL MANAGEMENT, INC. AND GENELLA POTTER'S  
MOTION TO RECONSIDER AND/OR CLARIFY THE COURT'S ORDER GRANTING  
PLAINTIFF'S MOTION TO ORDER DEFENDANTS ABL MANAGEMENT, INC.  
AND GENELLA POTTER NOT TO DESTROY PRODUCTION RECORDS

Come now Defendants ABL Management, Inc. and Genella Potter, by and through

counsel, pursuant to LOCAL RULE 7.01(b), and hereby move the Court to reconsider or clarify its

Order granting Plaintiff's Motion to Order Defendants ABL Management, Inc. and Genella

Potter not to destroy Production Records. In support of their Motion, Defendants state the

following:

**INTRODUCTION**

This is a 42 U.S.C. § 1983 lawsuit brought by Plaintiff against Defendants ABL  
Management, Inc. and Genella Potter (hereinafter "Defendants") and others at the Maury County  
Jail arising out of Plaintiff's "conditions of confinement" claims related to Plaintiff's  
incarceration at the Maury County Jail between June 2, 2011 to March 27, 2013. Plaintiff has